

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE-OPELOUSAS DIVISION

LEAM DRILLING SYSTEMS, INC. and
LIBERTY MUTUAL INSURANCE
COMPANY

CIVIL ACTION NO.
6:10-cv-01698

VERSUS

JUDGE DOHERTY

PETROHAWK ENERGY CORPORATION
and CHUBB & SON, A DIVISION OF FEDERAL
INSURANCE COMPANY

MAGISTRATE HILL

MOTION FOR LEAVE TO AMEND
COMPLAINT FOR DECLARATORY JUDGMENT

NOW INTO COURT, through undersigned counsel, come Leam Drilling Systems,
Inc. and Liberty Mutual Insurance Company, who move this Honorable Court as follows:

1.

Plaintiffs move pursuant to Rule 15(a)(1) to file the attached Amended Complaint for
Declaratory Judgment previously filed in the above entitled and numbered cause in order to
substitute as a defendant, FEDERAL INSURANCE COMPANY, a foreign insurer organized
and existing by virtue of the laws of the State of Indiana who may be cited to appear and
answer herein by serving its registered agent for service of process; namely the Louisiana
Secretary of State, 8585 Archives Ave., Baton Rouge, LA 70809, in place and instead of
Chubb & Son, A Division of Federal Insurance Company.

2.

The above amendment is filed on the grounds that Chubb & Son, A Division of Federal Insurance Company was previously named as defendant Petrohawk Energy Corporation's liability insurer. Plaintiffs have been advised that Federal Insurance Company is the insurer of Petrohawk.

3.

No service has been effected on Chubb & Son herein.

Respectfully submitted,

DAIGLE RAYBURN LLC

BY: /s/Susan A. Daigle
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**COUNSEL FOR LEAM DRILLING
SYSTEMS, INC. and LIBERTY MUTUAL
INSURANCE COMPANY**

C E R T I F I C A T E

I HEREBY CERTIFY that a copy of the above and foregoing has this date been filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent by operation of the court's electronic filing system to all parties that have consented to receive service electronically. I also certify that the above and foregoing has this date been forwarded by either facsimile, hand delivery, Federal Express, or U.S. Mail, postage prepaid and properly addressed to the non-CM/ECF participants on this the 4th day of January, 2011.

/s/Susan A. Daigle
SUSAN A. DAIGLE, #4459